

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
RICHMOND DIVISION

LULA WILLIAMS, <i>et al.</i> ,)	
)	
Plaintiffs,)	
)	Case No. 3:17-cv-00461 (REP)
v.)	
)	
BIG PICTURE LOANS, LLC, <i>et al.</i> ,)	
)	
Defendants.)	

**DEFENDANT MATT MARTORELLO'S STIPULATION REGARDING REMAINING
ELEMENTS OF RICO 1962(c) CLAIM**

Defendant Matt Martorello, by and through his undersigned counsel, hereby files the following stipulation regarding Plaintiffs' Claim under 18 U.S.C. §1962(c):

Given the Court's June 27, 2023 ruling that control is not a prerequisite for purposes of § 1962(c) liability, (*see, e.g.*, June 27 Transcript at 177:1-5; 180:9-12), **Mr. Martorello stipulates that, for the entire class period, he was associated with an association-in-fact enterprise the activities of which affect, interstate or foreign commerce, and Mr. Martorello participated in the operation of the affairs of the enterprise through the collection of unlawful debt.**

As a result, there are no remaining triable issues of material fact regarding Plaintiffs' § 1962(c) claim, and the Court can enter summary judgment on Plaintiffs' § 1962(c) claim.¹

Dated: June 30, 2023

/s/ John David Taliaferro
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¹ Defendant reserves the right to appeal the Court's legal rulings made with respect to § 1962.

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AGREED TO:

Dated: June 30, 2023

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Counsel for Plaintiffs

CERTIFICATE OF SERVICE

I certify that on this 30th day of June, 2023, a true and correct copy of the foregoing was served upon all parties that are registered to receive electronic service through the Court's ECF notice system in the above case.

/s/ John David Taliaferro
John David Taliaferro (Va. Bar. 71502)